

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYNQOR, INC.

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Civ. No. 2:14-CV-286-RWS-CMC

JURY TRIAL DEMANDED

**JOINT SUBMISSION OF NARROWED LIST OF
OBJECTIONS TO DEPOSITION DESIGNATIONS**

Pursuant to the Court's Order Regarding Motions in Limine and Objections to Exhibits and Deposition Designations (Dkt. 295), Plaintiff SynQor, Inc. and Defendant Cisco Systems, Inc. (collectively "the Parties") submit the following narrowed list of remaining objections to deposition designations.

SynQor's Objections to Cisco's Designations			
	<u>Deponent/Date</u>	<u>Pages/Lines</u>	<u>Objection(s)</u>
1.	Steigerwald, Robert (10/28/2013)	All designations	Contrary to the parties' stipulation at Dkt. 299 (Joint Pre-Trial Order) at 8 (¶19); Improper Expert Testimony (Rule 701, 702); Unfairly prejudicial (Rule 403)

SynQor's Objections to Cisco's Designations			
<u>Deponent/Date</u>		<u>Pages/Lines</u>	<u>Objection(s)</u>
2.	Vinciarelli, Patrizio (3/9/2011)	92:12 – 96:3	Lack of Foundation; Lack of Personal Knowledge (Rule 602); Calls for Speculation; Unfairly prejudicial (Rule 403); Relevance (Rule 402)

Cisco's Objections to SynQor's Designations			
<u>Deponent/Date</u>		<u>Pages/Lines</u>	<u>Objection(s)</u>
1.	Ballenger, January 15, 2014	25:11-28:5 28:8-20	Hearsay (Rule 803) [PTX-968]
2.	Ballenger, January 15, 2014	36:16-37:10 38:6-39:15	Excluded Under Motion <i>in Limine</i> No. 1; Unfairly prejudicial (Rule 403)
3.	Phillip Davies, January 17, 2014	97:16-98:17 100:21-101:20 102:3-103:3	Hearsay (Rule 803) [PTX-1154]
4.	Montminy, February 19, 2014	366:5-8 366:18-367:2 369:5-22	Hearsay (Rule 803) [PTX-1197 and PTX-1198]
5.	Prager, March 10, 2011	66:9-12 66:17-23 67:10-14	Undisclosed/improper expert opinion (Rule 702; Rule 26)

The parties have otherwise resolved all disputes concerning deposition designations and will submit a table of agreed-to and pre-admitted testimony following the November 6, 2015 continued pretrial conference.

Dated: November 6, 2015

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on November 6, 2015.

/s/ David T. DeZern